

Exhibit 1

Fw: [EXTERNAL] Huddleston v. FBI, Case 4:20-cv-00447-ALM

From: Ty Clevenger (tyclevenger@yahoo.com)

To: james.gillingham@usdoj.gov

Date: Friday, January 5, 2024 at 12:35 PM EST

Did the FBI have anything to say about this? I ask because we plan to seek the production of metadata and file names first, and we believe it could be produced pretty quickly without much need for human review.

----- Forwarded Message -----

From: Gillingham, James (USATXE) <james.gillingham@usdoj.gov>

To: Ty Clevenger <tyclevenger@yahoo.com>; Callahan, Cossette (USATXE) <Cossette.Callahan@usdoj.gov>

Sent: Friday, December 8, 2023 at 10:25:46 AM EST

Subject: RE: [EXTERNAL] Huddleston v. FBI, Case 4:20-cv-00447-ALM

Ty,

Thanks for reaching out. I am still getting up to speed, but am speaking with the client today. I should have a better feel for the status. Once I do, I will let you know what timing looks like and we can discuss the status report.

James Gillingham

903-510-9346

From: Ty Clevenger <tyclevenger@yahoo.com>

Sent: Thursday, December 7, 2023 5:24 PM

To: Gillingham, James (USATXE) <JGillingham@usa.doj.gov>; Callahan, Cossette (USATXE) <CCallahan@usa.doj.gov>

Subject: [EXTERNAL] Huddleston v. FBI, Case 4:20-cv-00447-ALM

Have either of you heard anything back from the FBI regarding the matter below? We are supposed to file a response to the court's order by next Tuesday.

----- Forwarded Message -----

From: Ty Clevenger <tyclevenger@yahoo.com>

To: Parker Andrea (USATXE) <andrea.parker@usdoj.gov>

Sent: Wednesday, November 29, 2023 at 03:16:58 PM EST

Subject: Huddleston order

Andrea,

I hope you had a good Thanksgiving and I hope things are well in Beaumont. I got back from medical leave about a month ago and I've been trying to get caught up. Easier said than done.

I spoke with my IT expert this afternoon and he recommended that we prioritize the production of metadata and file names. He said the metadata and file names could be produced in a matter of hours, and they should not contain any exempt information, particularly in the case of the personal laptop image.

Once we had the file names, we could further prioritize the documents that we are interested in. A lot of the files are going to be junk, I'm sure. Please let me know your thoughts.

Ty

Re: [EXTERNAL] Re: Huddleston

From: Gillingham, James (USATXE) (james.gillingham@usdoj.gov)

To: tyclevenger@yahoo.com

Cc: cossette.callahan@usdoj.gov

Date: Wednesday, January 10, 2024 at 06:57 PM EST

Ty,

Understood. I'm working with the client to put something together. I'll circulate as soon as I can.

James

Get [Outlook for iOS](#)

From: Ty Clevenger <tyclevenger@yahoo.com>
Sent: Wednesday, January 10, 2024 5:54:25 PM
To: Gillingham, James (USATXE) <JGillingham@usa.doj.gov>
Cc: Callahan, Cossette (USATXE) <CCallahan@usa.doj.gov>
Subject: Re: [EXTERNAL] Re: Huddleston

I will be flying tomorrow, so the sooner the better.

On Wednesday, January 10, 2024 at 10:59:45 AM EST, Ty Clevenger <tyclevenger@yahoo.com> wrote:

BTW, please let me review the proposed schedule before it is filed. Thank you.

Ty

On Tuesday, January 9, 2024 at 09:55:18 PM EST, Ty Clevenger <tyclevenger@yahoo.com> wrote:

I've attached a request for clarification, a motion for attorney fees, and our proposed production schedule.

On Tuesday, January 9, 2024 at 04:20:39 PM EST, Gillingham, James (USATXE) <james.gillingham@usdoj.gov> wrote:

Ty,

Sorry, I have been out of pocket yesterday and today and am just now trying to get caught up on email. If it is easier and you want to send your portion, I can work that into a draft with ours and circulate.

James Gillingham

903-510-9346

From: Ty Clevenger <tyclevenger@yahoo.com>
Sent: Tuesday, January 9, 2024 3:18 PM
To: Gillingham, James (USATXE) <JGillingham@usa.doj.gov>
Cc: Callahan, Cossette (USATXE) <CCallahan@usa.doj.gov>
Subject: [EXTERNAL] Re: Huddleston

Andrea would usually put together a status report or joint proposal and then insert my portion into it. We can do it that way, or I can incorporate your portion into what I have already drafted. I am scheduled to fly from NY to Texas on Thursday, so I can send you my portion in advance or vice versa. Just let me know.

Ty

On Tuesday, January 9, 2024 at 01:56:45 PM EST, Ty Clevenger <tyclevenger@yahoo.com> wrote:

James,

Can the FBI say what contents are on the tape drive and/or DVD drive? I ask because the contents may be audio or video, which would fall outside the typical "pages per month" production rate. If the DVD is a video file that shows Seth Rich walking home on the night of his murder, for example, then we would need to address that separately from the PPM in the status report.

Ty

On Friday, January 5, 2024 at 11:28:50 AM EST, Ty Clevenger <tyclevenger@yahoo.com> wrote:

James,

I reviewed the 11/28/23 order today and came across the following paragraph on page 24:

With the exceptions of Seth Rich's work laptop, the DVD, the tape drive, and the compact disk containing images of Seth Rich's personal laptop, which are responsive to Huddleston's FOIA requests, the Court finds the Government properly withheld or redacted information responsive to Huddleston's requests in accordance with the FOIA's exemptions.

Elsewhere, the order states that it is deciding Dkt. #73 and #77, but there are several other motions that have yet to be decided (e.g., about whether CrowdStrike reports must be produced). I'm thinking about asking the court to clarify whether the foregoing paragraph is directed to all outstanding requests or just #73 and #77. Please let me know your thoughts. Thank you.

Ty